

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: Myrta I. Torres Debtor(s)	§ § § § §	Case No. 15-34440-H1-13 Chapter 13
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DEBTOR(S)' RESPONSE TO MOTION FOR RELIEF FROM STAY

(Regarding Docket No(s). 54)

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW MYRTA I. TORRES (the "Debtor(s)"), and files this *Response to Motion for Relief from Stay* (Docket No. 54) (the "Motion") filed by New Residential Mortgage, LLC (the "Movant") regarding Debtor(s)' property, the real property located at 2714 Magnolia Court, Stafford, TX 77477 (the "Property"), and in support thereof would show the following:

Admissions & Denials

1. Debtor(s) admits the allegations in paragraph(s) 5, 6, and 17.
2. Debtor(s) denies the allegations in paragraph(s) 8, 10, and 11.
3. Debtor(s) does not have sufficient information to admit or deny the allegations in paragraph(s) 9.
4. Paragraph(s) 1, 2, 3, 4, 7, 13, and 16 characterize(s) the nature of the claims or relief sought to which no response is required. To the extent a response is required, Debtor(s) denies these allegations denies that Movant is entitled to such claims, defenses, or relief sought.
5. No response is required to Paragraph(s) 12, 14, and 15 marked not applicable, left blank or incomplete.

Affirmative Defenses

6. Debtor(s) retains equity in the Property and/or is necessary for the reorganization or rehabilitation of the Estate.

WHEREFORE, Debtor(s) prays that the Court deny the Motion and grant Debtor(s) any other relief the Court deems just and appropriate.

Respectfully submitted,

GUZMAN LAW FIRM

/s/ Eloise A. Guzman

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served on the following on 05/21/2020 and the parties on the attached list, if any:

Debtor via U.S. Mail

Myrta I. Torres
2714 Magnolia Ct.
Stafford, TX 77477

New Residential Mortgage, LLC
PO Box 10826
Greenville, SC 29603

Shelly K. Terrill
Padgett Law Group
5501 LBJ Fwy., Ste. 925
Dallas, TX 75240

Via ECF/CM

David G. Peake, Chapter 13 Trustee
U.S. Trustee

/s/ Eloise A. Guzman

Eloise A. Guzman

Mayur M. Patel